

Robert F. Semmer (State Bar No. 102576)
Cathleen G. Fitch (State Bar No. 95302)
COUGHLAN, SEMMER & LIPMAN, LLP
501 West Broadway, Suite 400
San Diego, CA 92101
(619) 232-0800
(619) 232-0107 (Fax)

Attorneys for SHC Management Corporation,
a dissolved Georgia Corporation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DAVID J. CHAO, an individual,

Plaintiff,

vs.

HEALTHSOUTH CORPORATION, a
Delaware corporation;
SHC SAN DIEGO, INC., a Georgia
corporation;
SHC MANAGEMENT COMPANY, a
Georgia corporation;
SURGICAL HEALTH CORPORATION, a
Delaware corporation;
HEALTHSOUTH SURGERY CENTERS-
WEST, INC., a Delaware corporation;
SURGICAL CARE AFFILIATES, LLC a
Delaware Limited Liability corporation;
ARTHROSCOPIC & LASER SURGERY
CENTER OF SAN DIEGO, L.P., and
DOES 1 through 100, inclusively,

Defendants.

CASE NO. 3:07-CV-2408 DMS WMc

**JOINDER OF DEFENDANT SHC
MANAGEMENT CORPORATION IN
NOTICE OF REMOVAL OF CIVIL
ACTION TO UNITED STATES
DISTRICT COURT PURSUANT TO 28
U.S.C. § 1441(b)**

TO THE CLERK AND JUDGES OF THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF CALIFORNIA:

PLEASE TAKE NOTICE that Defendant SHC MANAGEMENT CORPORATION, a
dissolved Georgia corporation, and without waiving its lack of capacity to be sued, by and
through its attorneys Coughlan, Semmer & Lipman, LLP, hereby joins in the Notice of Removal

1 of Civil Action of Defendant Surgical Care Affiliates, LLC, filed on December 26, 2007.

2 DATED: January 2, 2008

Respectfully submitted,

3 **COUGHLAN, SEMMER & LIPMAN, LLP**

4
5 By s/ Cathleen G. Fitch
6 Robert F. Semmer, Esq.
7 Cathleen G. Fitch, Esq.
8 Attorneys for SHC Management Corporation

9 @PFDesktop\::ODMA/PCDOCS/CSL/65391/1

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify:

1. I am over the age of 18 years and a resident of San Diego County, California; my business address is 501 W. Broadway, Suite 400, San Diego, California 92101; I am not a party to the above-entitled action;

2. On this date I caused the following document(s) to be filed and served electronically via the Court's CM/ECF System except as otherwise stated in paragraph #3 below:

**JOINDER OF DEFENDANT SHC MANAGEMENT CORPORATION IN
NOTICE OF REMOVAL OF CIVIL ACTION TO UNITED STATES DISTRICT
COURT PURSUANT TO 28 U.S.C. § 1441(b)**

3. I caused the documents listed above to be served on the following party/parties by other means addressed to the last known address and delivered as follows:

[] Each envelope was placed for deposit in the U.S. Mail according to the normal business practices observed at this office, with first class postage prepaid to:

N/A

I declare that I am a member of the Bar of this Court, and it was at my direction the above described service was made.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 2, 2008, California.

s/ Cathleen G. Fitch